

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LYNN ZELVIN, on behalf of himself and
all others similarly situated,

Plaintiffs,

v.

H HERITAGE, INC.,

Defendant.

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Civil Case No.: 1:23-cv-08022-JGLC

**DECLARATION OF MARS
KHAIMOV IN SUPPORT OF
PLAINTIFF'S OPPOSITION
TO DEFENDANT'S
MOTION TO DISMISS**

I, Mars Khaimov, hereby declare the following to be true and correct to the best of my knowledge and belief under penalty of perjury pursuant to 28 U.S. Code § 1746:

1. I am the principal attorney of the law offices of Mars Khaimov Law, PLLC, and I represent plaintiff Lynn Zelvin ("Plaintiff") in the above-captioned action.

2. Research conducted in preparation of the pleadings for this case revealed that, although Defendant's physical operation is located in Alabama, Defendant's website, Holtzleather.com (the "Website") is listed as the *seventh* website result when searching for "men's leather front pocket wallet" on Google, even when the computer on which the search is being performed is connected to a server located in New York.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 28, 2024



By: Mars Khaimov, Esq.